



ROCKY FLATS OFFICE  
AMFO REVIEW OF TECHNICAL DOCUMENTS  
REVIEW COMMENT RECORD

Document Reviewed (Title, Number, Revision, Date, etc ) RFP Chemical Management Program Description Document Draft, 8/23/93			Reviewer Mario Acevedo Signature Date 9/14/93 Phone 6498 Organization WPD, SMS		Agreement with Dispositions Date Reviewer Document Preparer	
*Comment Type E = Essential (agreement must be documented for other than verbatim incorporation), S = Suggested, Non-C = Nonconcurrence						
Comment No	Comment Type*	Para No	Comment		Disposition	
1	Non C	Overall	This document provides much detailed instruction about chemical management with the assumption that because procedures are published that the actions so specified do take place What is needed is enforcement of these instructions to ensure that these procedures are indeed executed For example, Section 5 1 6 3, Industrial Hygiene and Safety is directed to distribute MSDSs in a timely manner when the actuality is that IH's request for MSDSs is backlogged and some of the organizations at RFP have to seek MSDSs on their own			
2	S	4 2	Receiving/Distribution Process Warehouse does not inventory or apply barcode labels to Systems Contracts which are the majority of packages that arrive at RFP Warehouse takes the position that it is the user's responsibility to ensure that all chemicals are properly inventoried and barcoded if necessary Additionally, Warehouse does not apply a CCS sticker to Systems Contract packages even if such packages do contain chemicals			
3	S	5 1 2 2 1	Change reference from "Chemical Tracking System" to read "Chemical Control System"			
4	S	5 1 3 7	The supervisor is to confirm that MSDSs for every hazardous chemical in the work area are readily available but does not specify how the supervisor should get the appropriate MSDS Industrial Hygiene should provide the MSDS but this is not always the case (See comment 1)			

Comment No	Comment Type*	Para No	Comment	Disposition
5	S	5 1 4 4	Drivers need to have immediate access to MSDSs of chemicals transported for emergency purposes No mention of this requirement has been included	
6	S	6 3 2 1	Chemical Tracking and Control Systems Group should be included in the Chemical Management Steering Committee	
7	S	6 5 6	Who is responsible for monitoring the expiration date of chemicals? The user, the Chemical Tracking Specialist, the Chemical Control Officer?	

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AMEM  
Form 91-01  
Rev 4, 08/31/93

Document Reviewed (Title, Number, Revision, Date, etc ) RFP Chemical Management Program Description Document Draft, 8-23-93, Rev 0		Reviewer C A Thompson Signature Date 9/13/93 Phone 6490 Organization WPD (SMS)	Agreement with Dispositions Date Reviewer Document Preparer	
*Comment Type E = Essential (agreement must be documented for other than verbatim incorporation), S = Suggested, Non-C = Nonconformance				
Comment No	Comment Type	Para No	Comments	Disposition
1	Non C	Overall	The purpose for this document is unclear Most of it (90%) provides information that can be found in other EG&G management plans, policies, and procedures For example nearly 11 pages of "responsibilities" are unnecessary, especially considering that many of the organizational responsibilities described in the Responsibilities section are described elsewhere in this document Another example the long discussion of release reporting in section 6 8 is redundant with similar sections in the HWRM and other documents	
			Much of the information is vague, and therefore of little or no value to the user For example Section 6 7, Process Outputs, specifically section 6 7 4, "Waste," tells the reader nothing It doesn't provide schedules whereby a Building Manager should inspect his/her building for chemical/waste dispositioning It merely says "the process of dispositioning begins " This means nothing to a Building Manager These words do not implement a "program," because there are no real program elements to implement What are the goals for the Chemical Management program? What are the plans to attain those goals? What is the current status of the program?	

Document Reviewed

Contract, Contract, Page No  
Type

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Disposition

Contract No	Contract Type	Page No	Disposition
2	E	Page 11	It appears that all that is really needed is a reference and brief description of the other procedures that implement the overall Chemical Management Program, along with the "tasks" needed for full implementation
3	E	41	Definition "segregate" also include 'radioactive/nonradioactive' as items should be segregated in this manner also
4	E	42	No decision point is provided for excess chemical list review prior to procuring new chemicals The flow chart describes "Warehouse/Receiving personnel apply CCS Chemical Container Barcode label This does not happen consistently, especially for chemicals purchased on a systems contract, making this statement misleading
5	E	42	"Chemical Tracking Specialists Checks Dock Daily for New Chemical Shipments" This does not happen for every building Suggest you check with CT&CS for more realistic picture Also, no mention is made in receiving/distribution flow chart of what happens with bulk tank receipts
6	E	47	Excess/Waste Chemical Dispositioning Activities Flow Chart Rad waste determination missing on this flow-chart
7	E	51221	"a database called the Chemical Tracking System" is incorrect It's called the 'Chemical Control System'
9	E	70	1-25500-HSP 9 12, Implementation of the Chemical Tracking Process is referenced throughout this document, but does not appear in Section 7 0, "References"
10	E	General	Where is the discussion of product tanks? One "note" on page 47 was the only mention of tanker deliveries